

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**  
*Plaintiff,*

**v.**

**YADVINDER SINGH BHAMBA,**  
*Defendant.*

**CRIMINAL NO. 17-178 (FAB)**

**GOVERNMENT’S MOTION TO EXCLUDE  
TRIAL WITNESSES OTHER THAN THE CASE AGENT**

**TO THE HONORABLE COURT:**

The United States of America, by and through its undersigned counsel, respectfully moves to exclude all witnesses, except the case agent, from the court during trial. Under Federal Rule of Evidence 615(c), a person whose presence is shown by a party to be “essential to the presentation of the party’s claim” should not be ordered excluded from the court during trial. The case agent in this prosecution, HSI Special Agent Rafael Escobar, has been critical in the investigation of the conduct alleged in the indictment and is an integral part of Government’s trial team. All other witnesses should be excluded.

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*Government's Motion to Exclude Witnesses*  
*United States v. Yadvinder Singh BHAMBA, Criminal No. 17-178 (FAB)*

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**WHEREFORE**, the United States respectfully requests that this Honorable Court  
**EXCLUDE** all witnesses, except the case agent, from the court during trial.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 29<sup>th</sup> day of August, 2018.

**BRIAN A. BENCZKOWSKI**  
Assistant Attorney General

*s/Ann Marie E. Ursini*  
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*Government's Motion to Exclude Witnesses*  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this same date, the foregoing was filed with the Clerk of the Court using CM/ECF system, which will submit notification of such filing to the attorneys of record.

**s/ Ann Marie E. Ursini**  
Ann Marie E. Ursini  
Trial Attorney